IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

) Chapter 15
In re:) Cose No. 17.11712 (DLS)
TAKATA CORPORATION, et al.,) Case No. 17-11713 (BLS)
) Jointly Administered
Debtors in a foreign proceeding.)
Takata MDL Plaintiffs,))
Appellants,)
v.) Civil Action No. 17-1717 (MWB)
Foreign Representative,)
Appellee.)

UNOPPOSED MOTION OF APPELLEE TAKATA CORPORATION TO MODIFY BRIEFING SCHEDULE

Takata Corporation (the "Appellee") in its capacity as the authorized foreign representative of itself, Takata Kyushi Corporation, and Takata Service Corporation (collectively, the "Japanese Debtors"), 1 as the appellee herein, hereby submits this motion (the "Motion") to extend the briefing schedule established by this Court's order [D.I. 15] (the "Scheduling Order") entered on January 3, 2018. In support of the Motion, Appellee respectfully states as follows:

- 1. On November 28, 2017, Appellant filed the instant appeal (the "Appeal") from the Order Granting Final Relief for Recognition of Foreign Main Proceedings [Bankr. D.I. 86] of the Honorable Brendan Linehan Shannon, entered on November 14, 2017, in the above-captioned bankruptcy cases.
 - 2. Appellant filed its opening brief on January 2, 2018. Pursuant to the Scheduling Order,

¹ Each of the Japanese Debtors are currently debtors in civil rehabilitation proceedings under the Civil Rehabilitation Act of Japan in the 20th Department of the Civil Division of the Tokyo District Court. On August 9, 2017, Takata Corporation filed voluntary petitions on behalf of the Japanese Debtors under chapter 15 of the United States Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware, commencing the above-captioned bankruptcy cases.

Appellee's answering brief is due on or before February 16, 2018 and Appellant's reply brief is due within fourteen days of the filing of Appellee's answering brief.

- 3. Appellee has consulted with Appellant and both parties have agreed to extend the briefing schedule such that the deadline for Appellee to submit its answering brief is March 30, 2018 and the deadline for Appellant to submit its reply brief is April 13, 2018.
- 4. Appellee submits that good cause exists to modify the briefing schedule in the manner requested. This modified schedule will provide the parties with an opportunity to attempt a global multi-party settlement that impacts not only this Appeal, but also other matters, including the confirmation of the chapter 11 plan in the jointly administered cases of TK Holdings Inc. and its affiliated chapter 11 debtors.² If settlement occurs, it may resolve this Appeal.

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² In re TKH Holdings Inc., et al., Case No. 17-11375 (Bankr. D. Del.).

WHEREFORE, Appellee respectfully requests that the Court enter an order, in the form attached hereto, modifying the briefing schedule in the manner set forth above, and grant such other and further relief as is just and proper under the circumstances.

Dated: February 9, 2018
Wilmington, Delaware

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